

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

STATE OF MISSOURI,
STATE OF NEBRASKA,
STATE OF ALASKA,
STATE OF ARKANSAS,
STATE OF IOWA,
STATE OF MONTANA,
STATE OF NEW HAMPSHIRE,
STATE OF NORTH DAKOTA,
STATE OF SOUTH DAKOTA,
STATE OF WYOMING,

Plaintiffs,

v.

JOSEPH R. BIDEN, et al.,

Defendants.

No. 4:21-cv-01300-DDN

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

MOTION FOR A PRELIMINARY INJUNCTION

The States of Missouri, Nebraska, Alaska, Arkansas, Iowa, Montana, New Hampshire, North Dakota, South Dakota, and Wyoming (the Plaintiff States) respectfully request that the Court issue a preliminary injunction enjoining Defendants from requiring any federal contractor or subcontractor to comply, pursuant to Executive Order 14042 or any similar order, with the Safer Federal Workforce Task Force's *Covid-19 Workplace Safety: Guidance for Federal Contractors and Subcontractors* or any similar requirement issued by the Safer Federal Workforce Task Force, the Office of Management and Budget, and/or the Federal Acquisition Regulatory Council.

The Plaintiff States incorporate by reference the arguments in its Memorandum in Support of this Motion, filed contemporaneously herewith.

Because the Defendants' vaccine mandate requires all employees of federal contractors to be vaccinated by December 8, 2021, that would require employees to receive their vaccine shot by November 24, 2021. Plaintiff States therefore request a ruling by **November 24, 2021**.

Dated: November 4, 2021

Respectfully submitted,

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**Admission application forthcoming*

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CERTIFICATE OF SERVICE

I hereby certify that, on November 4, 2021, a true and correct copy of the foregoing and any attachments were filed electronically through the Court's CM/ECF system, to be served on counsel for all parties by operation of the Court's electronic filing system and to be served on those parties that have not appeared who will be served in accordance with the Federal Rules of Civil Procedure by mail or other means agreed to by the party.

/s/ Justin D. Smith